

REMARKS

Claims 1-24 are pending.

Claims 1-24 stand rejected.

Claims 1 and 9 are amended. No new matter has been added. Support for these amendments can be found, at least, within paragraphs [0027]-[0030] of the specification.

Rejection of Claims under 35 U.S.C. § 101

Claims 1-8 stand rejected under 35 U.S.C. § 101 as purportedly not qualifying as a statutory process. Without agreeing to this rejection, in the interest of advancing prosecution, Applicants have amended Claim 1. Applicants respectfully submit that these amendments overcome this rejection.

Claims 9-24 stand rejected under 35 U.S.C. § 101 because the claimed invention is purportedly directed to non-statutory subject matter. Applicants have amended Claim 9 to recite that the claimed instructions are stored on a computer readable medium, as suggested by the Examiner. Applicants respectfully submit that this amendment overcomes this rejection.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 1-24 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over U.S. Patent No. 5,708,828, issued to Coleman ("Coleman") in view of U.S. Publication No. 2004/0039576, naming He et al. as inventors ("He"). Applicants respectfully traverse this rejection.

Amended independent Claim 1:

synchronizing a source system with a target system, wherein  
the source system is one of a plurality of computer systems,  
the target system is another of the plurality of computer systems, and  
the synchronizing comprises  
extracting source inventory location information from a source  
inventory location record, wherein  
the extracting is performed by an integration server in  
response to a trigger,  
the trigger indicates that the synchronizing should be  
performed,  
the source inventory location information is in a source  
format, and  
the source format corresponds to the source system,

converting the source inventory location information into an intermediate format, and  
converting the intermediate format into target inventory location information, wherein  
the target inventory location information is in a target format, and  
the target format corresponds to the target system, and  
updating a target inventory location record with the target inventory location information, wherein  
the updating is performed by the integration server,  
the target inventory location record is in the target format, and  
the target inventory location record corresponds to the source inventory location record.

(Emphasis added.)

Amended independent Claim 9 recites similar limitations. Applicants respectfully submit that Coleman and He, alone or in any combination, fail to teach or suggest, at the very least: (1) an integration server contributing to synchronizing a source system with a target system by extracting from the source system and updating the target system; and where (2) the synchronizing updates a target record on a target system that corresponds to a source record on a source system. The cited references fail to teach these two limitations (among others), at least because neither reference is directed toward synchronizing information through the use of an intermediate format. Further, nothing like the extracting and updating steps within the claimed synchronizing are present within either cited reference.

Coleman focuses on converting data from one data environment to another data environment. *See* Coleman, Abstract. Coleman is completely silent on the concept of synchronization of any kind. In other words, Coleman does not consider a situation where a source and target system have any manner of corresponding information, such that when the information in a source is changed, the target system is synchronized with the corresponding changed information on the source system. Further, the Office Action concedes that Coleman fails to teach synchronization. *See* Office Action, p. 6 (“Coleman does not explicitly teach synchronizing inventory location information, creating a new inventory location record in the target computerized inventory management system or updating an existing inventory location record in the target computerized inventory management system.”). Without any contemplation of synchronization of any kind, Coleman is incapable of teaching or suggesting any aspect of the claimed synchronization of inventory location information.

The He reference focuses on leveraging data from two different sources, particularly to adding electronic data interchange (EDI) data received into an internal information system. *See*, e.g., He, Abstract and ¶ [0002]. However, He's concept of data integration bears no resemblance to the claimed synchronization method, and certainly is in no way analogous to the claimed synchronization between corresponding records on a source and target system.

The secondary reference, He, presents a method for converting and incorporating incoming data in order to perform an action in response to the converted data. For example, He's system receives EDI data from a customer pertaining to a shipping requirement. *See* He, ¶ [0011]. Next, He's system translates the received EDI data into a standard format and stores the translated data in a database. *See* He, ¶ [0011]. Next, He's system retrieves data according to the received shipping requirement and sends a shipping schedule. *See* He, ¶ [0011]. In other words, He's concept of data manipulation is to translate incoming data in order to utilize locally stored data. He's is not related to any kind of synchronization between systems – such as that performed by the claimed invention between the claimed source computerized inventory management system and a target computerized inventory management system. Thus, He does not present any systems with corresponding data records that are synchronized in any kind of way.

In He, the incoming data from the customer regarding shipping requirements is not used to update a corresponding record in the receiving internal management information system. He's system will simply convert and utilize incoming data in order to generate a shipping schedule. In other words, He translates data from one source in order to access data from a second source, in order to generate a result. He does not perform any manner of data synchronization. Certainly, synchronizing the data received from the customer and the internal data is in no way even contemplated by He. This is at least because He does not use the received data corresponding to a source record to update a corresponding record in the internal data. He simply does not present anything related to the concept of two different systems with corresponding data records – particularly where updated data in one record in one system is synchronized with a corresponding data record on another system. There is no suggestion at all within He that any part of the data from one source corresponds with data from another source. Simply put, He employs two sources of data, where data from one source is moved to the other source, but there is no synchronizing of these two different sources of data. The claimed invention, by marked contrast, employs a source system and a target system, where data corresponding to a source record is extracted from the source system and a corresponding record on the target system is

updated with the extracted data. Without this basic idea present in He, there is no way for He to teach or suggest the claimed synchronization.

The Office Action, in an attempt to justify its position, cites the Abstract, Claim 1, and paragraphs [0010], [0011], [0018], [0020], [0024], and Figure 4 of He. However, these cited sections do not disclose any type of synchronization, but instead simply present the aspect of data retrieval discussed above. He's Abstract, Claim 1 and paragraphs [0010] and [0011] present the components of He's system, which retrieves both the received data and the internal data to produce a shipping schedule, but these sections fail to describe any kind of synchronization of data. Paragraph [0018] further describes the components of He's system as presented within Figure 1. Paragraph [0020] describes the schematic diagram of a sales order control unit, which is one of the components within He's system. Paragraph [0024] describes the data path from a customer into the internal system's database and the required translations of data as it moves along the data path. Figure 4 is a flowchart of processing data received by the customer. Each of these cited sections present aspects of He's system described above, without any disclosure of any kind of synchronization.

Further, because He's system is silent regarding the claimed aspects of the claimed synchronization, an ordinary artisan cannot be expected to extrapolate from He, in any way that would allow one to arrive at the claimed invention. In other words, He's system manipulates data from two sources of information to produce a third piece of information: a shipping schedule. An ordinary artisan would be unable to interpret He's system in any way that allows one to successfully equate He's teachings to the claimed synchronization of corresponding data records on two different systems.

Thus, because He fails to teach or suggest the elements of the claimed synchronization, it necessarily follows that He fails to teach or suggest: (1) an integration server contributing to synchronizing a source system with a target system by extracting from the source system and updating the target system; and where (2) the synchronizing updates a target record on a target system that corresponds to a source record on a source system.

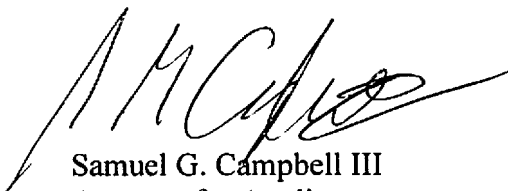
For at least these reasons, Applicants submit that neither Coleman nor He, alone or in combination, provide disclosure of all the limitations of independent Claims 1 and 9, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

**CONCLUSION**

Applicants submit that all claims are now in condition for allowance. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. G. Campbell III', with a long horizontal flourish extending to the right.

Samuel G. Campbell III  
Attorney for Applicants  
Reg. No. 42,381  
Telephone: (512) 439-5084  
Facsimile: (512) 439-5099